

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
CHALMETTE REFINING, L.L.C.)	
)	
Request for Waiver of Section 90.209(b) of the)	
Commission's Rules)	
)	
Implementation of Sections 309(j) and 337 of)	WT Docket No. 99-87
the Communications Act of 1934 as Amended)	

REQUEST FOR LIMITED WAIVER AND EXTENSION

Chalmette Refining, L.L.C. (“Chalmette”), pursuant to Sections 1.3 and 1.925 of the Federal Communications Commission’s (“FCC” or “Commission”) rules, submits this request for a temporary, four-month extension of the deadline by which Chalmette must migrate equipment associated with KNEJ243 to narrowband technology.¹ Chalmette holds numerous licenses for private land mobile radio services in the 150-174 MHz, 421-512 MHz (VHF/UHF) and other bands and, as described more fully below, fully satisfies the requirements for waiver relief set forth in the Commission’s rules and guidance regarding narrowband waiver and extension requests.²

¹ See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, WT Docket No. 99-87, RM-9332, 18 FCC Rcd 3034 (2003); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order*, WT Docket No. 99-87, RM-9332, 19 FCC Rcd 25045 (2004); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Order*, WT Docket No. 99-87, RM-9332, 25 FCC Rcd 8861 (2010); 47 C.F.R. §§ 90.203(j), 90.209(b). For purposes of this request, “narrowband deadline” shall mean January 1, 2013.

² See Wireless Telecommunications Bureau, Public Safety and Homeland Security Bureau, and Office of Engineering and Technology Provide Reminder of January 1, 2013 Deadline for Transition to Narrowband Operations in the 150-174 MHz and 421-512 MHz Bands and Guidance for Submission of Requests for Waiver and Other Matters, *Public Notice*, DA 11-1189 (rel. July 13, 2011) (“*Narrowband Guidance*”).

Chalmette produces highly combustible fuels, such as gasoline, diesel, kerosene, propane, and butane. Strict application of the narrowband deadline to the KNEJ243 license Chalmette employs in its emergency response and safety-management system would have severe negative consequences not only for Chalmette, which has no readily available alternative to the intrinsically safe narrowband system that is the subject of this waiver request, but also for nearby residents and first-responders, who depend on Chalmette to communicate plant-wide hazards and disasters and to provide mutual aid in times of crisis.

Chalmette's emergency response radio system does not use a substantial amount of bandwidth, and it employs a unique communications platform with an outdated control unit that is difficult to maintain, update, and support. Communications devices operating at Chalmette's 400-acre refinery must be designed and operated to avoid producing sufficient electrical or thermal energy to ignite the gases that may be found at the facility. As a result of the system design requirements and the safety-of-life element of the communications conveyed over the system, transitioning to narrowband equipment will require Chalmette to replace much of its existing radio equipment while carefully preserving the same level of functionality and performance as the current system.

Despite these challenges, Chalmette will have successfully migrated six of its seven VHF/UHF licenses to the required narrowband channelization by January 1, 2013.³ Chalmette completed the narrowbanding of WPVK267 earlier this year and will complete narrowbanding activities on all but one of the remaining licenses prior to January 1, 2013. As explained more fully below, however, facilities associated with KNEJ243 will require up to an additional four months to complete. Despite the need for additional time on one of its seven licenses, Chalmette

³ Chalmette holds seven active VHF/UHF licenses: KB25465, KB28795, KF4864, KKI430, KNEJ243, KNEJ244, and WPVK267. Chalmette plans to have migrated all but KNEJ243 by January 1, 2013.

has taken a number of steps to plan for, initiate, and complete its narrowband migration.

Chalmette has secured funding and ordered the necessary equipment. In addition, Chalmette has arranged for equipment installation, provisioning, testing, and activation, and is prepared to take the necessary precautions to eliminate any harmful interference that its continued wideband operations may cause to nearby co-channel and adjacent channel licensees, even though that risk is extremely low. Perhaps most important, the nearby St. Bernard Parish Fire Department, another user of VHF/UHF spectrum, fully supports Chalmette's waiver request. Finally, Chalmette has established a plan to complete the narrowband conversion by early next year. Accordingly, Chalmette seeks a temporary waiver of the narrowband deadline for KNEJ243 until May 1, 2013, a period of four months.

I. BACKGROUND

A. Chalmette's 1000 Employees Produce Approximately Ten Million Tons of Highly Combustible Fuels Annually.

Chalmette is a mid-sized refinery originally constructed around 1915 in an area covering approximately 400 acres of land located in Louisiana along the banks of the Mississippi River. With approximately 1,000 employees and contractors, Chalmette Refining operates 24 hours per day, 7 days per week, 365 days per year and is capable of processing up to 190,000 barrels of crude oil per day, or nearly 10 million tons per year. The refinery currently produces, or is capable of producing, a variety of oil-based products, including gasoline, diesel, kerosene, propane, butane, aromatics, fuel oil, refinery grade propylene, sulfur, petroleum coke, and asphalt.⁴

⁴ See Department of Environmental Quality, State of Louisiana, *available at* <http://www.deq.louisiana.gov/portal/Portals/0/assistance/ELP/P2/Chalmette.pdf>.

B. Chalmette Will Have Updated Six of Its Seven VHF/UHF Licenses by January 1, 2013.

Chalmette uses all but one of its VHF/UHF licenses to support “turnaround radios.” In the refining industry, a “turnaround” is a planned total or partial shutdown of the refinery to maintain, repair, replace, or overhaul refinery equipment.⁵ Turnarounds are planned months to years in advance and can last from one to four or more weeks. Communications systems are critical in turnarounds because incidents are more likely to occur during these complex operations.

Chalmette’s “turnaround” radio communications system uses six of its UHF/VHF licenses and supports approximately 200 land mobile radios that rely on five repeaters at three separate locations. Chalmette’s workers use these UHF/VHF devices for one-to-one and one-to-many push-to-talk communications throughout the facility during turnaround operations. Chalmette will have narrowbanded this equipment prior to January 1, 2013.

C. Chalmette Relies on KNEJ243 to Convey Critical Safety and Emergency Information to Its Workforce and First Responders.

Safety is a core value at Chalmette, which has designed its operations and policies to ensure the continued safety and welfare of its employees, contractors, customers, and the public. This longstanding commitment to safety, manifested through Chalmette’s steadfast goal of zero work-related injuries and illnesses per year, has allowed Chalmette to offer a safe workplace while also improving operational reliability, efficiency, and productivity.

The refinery is a large, noisy and potentially hazardous manufacturing environment that employs a large number of individuals and contractors, whose diverse backgrounds and language skills make refinery-wide communications difficult. Even under the best of circumstances,

⁵ See generally American Petroleum Institute, Refinery Turnarounds (Dec. 7, 2012, 10:00 AM), <http://www.api.org/oil-and-natural-gas-overview/fuels-and-refining/refineries/refinery-turnarounds.aspx>.

phones often cannot be heard over the ambient noise, and refinery-wide communications may require translation into multiple languages to be understood by the diverse workforce. Rather than rely on personal communications devices and risk translation errors and delays associated with relying exclusively on oral communications over a public address system, Chalmette has deployed a centralized communications system that produces unique tones, wails, and woops that employees and contractors are trained to recognize. These audible tones instantly provide workers and contractors with critical information about plant activities and emergencies without posing the fire hazard associated with many personal communications devices and without the delay and complexity associated with translating safety-of-life information into multiple languages.

Chalmette's wireless communications system – the IPS 400/800 In-Plant Personnel Warning System (the "IPS 400/800 Warning System")⁶ – is central to its ability to provide a safe work environment. The IPS 400/800 Warning System enables authorized personnel to broadcast public announcements or warning sirens in the event of a fire, natural disaster, emergency or high-risk activity. For example, Chalmette routinely uses the IPS 400/800 Warning System to alert personnel when heavy equipment is being lifted or transported in a particular part of the refinery, in the event of a fire, or in anticipation of severe or inclement weather that may affect field operations. These transmissions alert staff and direct evacuations as necessary, and provide critical information to Chalmette's first responder unit, which consists of three fire trucks (one of which is a ladder truck), one rescue truck, one hazardous materials response truck, and 130 first responders, which includes 47 medically trained staff members, a nurse practitioner, a nurse, and an assistant.

⁶ The Warning System is manufactured by Whelen Engineering, Inc., and the installation, operating, and troubleshooting manual is available online at <http://www.whelen.com/install/135/13596.pdf>.

The principal components of the IPS 400/800 Warning System are as follows:

- **Cabinets.** Twenty aluminum cabinets fixed throughout the refinery contain the functional components of the IPS 400/800 Warning System, including the power supply, processing units, and output mechanisms.
- **Driver Boards.** Located within each cabinet is a driver board—a system processor that hosts the radio communications and tone generating components of the IPS 400/800 Warning System. The driver board serves as the core of the Warning System and allows each cabinet to receive messages from the main controller.
- **Speakers.** Each cabinet is connected to broadcast speakers located strategically throughout the refinery, at both indoor and outdoor locations. Chalmette can control the IPS 400/800 Warning System to operate with various combinations of speakers, depending on the circumstances. (For example, Chalmette’s safety managers may want to limit announcements to certain areas of the refinery.)
- **Controller.** Authorized employees use a central control unit with specialized software to remotely operate the IPS 400/800 Warning System, make public announcements via an attached microphone, and control which radio panels receive a particular broadcast or emergency tone. As explained below, the controller currently consists of a personal computer, which will be replaced in the narrowband migration. The controller wirelessly communicates to the driver boards.
- **Repeater Antennas.** The controller sends messages to the Repeater Antennas, which retransmit the messages to the cabinets.
- **Wireless Spectrum.** Chalmette operates the IPS 400/800 Warning System using Call Sign KNEJ243 for transmissions from the controller to the cabinets and from the cabinets back to the controller.

II. CHALMETTE SATISFIES THE REQUIREMENTS FOR A TEMPORARY WAIVER OF THE NARROWBAND DEADLINE

The Commission has identified a number of factors that will be relevant in determining whether a licensee is entitled to a temporary waiver of the narrowband deadline. The relevant factors include: (1) the steps the licensee has taken to plan for, initiate, and complete the transition to narrowband operations; (2) the size and complexity of the relevant communications system; (3) whether the system equipment is already capable of operating in narrowband mode

or must be replaced or upgraded; (4) whether the licensee plans to implement additional system upgrades or improvements in addition to migrating to narrowband operations; (5) the funding sources, including whether the licensee's budget requires government approval or a multi-year budget process; (6) whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationship or other interdependencies; and (7) whether and how the licensee plans to minimize the negative impact of extended wideband operations on co-channel and adjacent channel operations.⁷ In view of these considerations, Chalmette is entitled to a temporary waiver and extension of the narrowband deadline.

A. Chalmette Has Taken a Number of Steps to Plan for, Initiate, and Complete the Transition to Narrowband Operations.

Chalmette has taken a number of steps to plan for, initiate, and complete its migration to narrowband technologies. Indeed, it plans to have successfully migrated six of its seven licenses to narrowband technology by January 1, 2013. As to the license for which waiver is requested, KNEJ243, Chalmette has also been working to narrowband the underlying equipment, but the IPS 400/800 Warning System associated with KNEJ243 is more outdated and more complex than the equipment associated with Chalmette's other six VHF/UHF licenses. Chalmette has nevertheless taken a variety of steps to narrowband this technology and continues to move swiftly forward even though it faces many challenges. For example, on November 15, 2012, Chalmette negotiated and executed a purchase order for the equipment and components necessary to make the IPS 400/800 Warning System narrowband compliant and has already authorized payment for the equipment. Payment for this order has been fully funded and the vendor is scheduled to deliver the equipment on or about December 31, 2012. Chalmette has also contracted with a third-party service provider, MS Benbow & Associates ("MS Benbow"),

⁷ See *Narrowband Guidance* at 3; see also 47 C.F.R. §§ 1.925(b)(3)(i)-(ii), 1.3.

to install, provision, test, and activate the narrowband IPS 400/800 Warning System. MS Benbow will also provide training to the workforce and offer ongoing support in connection with those services. In addition to these activities, Chalmette has consulted with MS Benbow on numerous occasions to identify the current capabilities of, and additional needs for, the IPS 400/800 Warning System. Those communications began earlier this year, and will continue on an ongoing basis until the Warning System is fully converted to narrowband.

B. Chalmette's Narrowband Migration Will Require the Complete Replacement of Certain Components in the Warning System

Chalmette's narrowband conversion is not a matter of simply updating radio transmission equipment. Rather, Chalmette must completely replace many of the core components of the Warning System, including hardware and software. The existing cabinets, driver boards, and related components (such as the router device) were installed approximately twenty years ago, and have been in continuous use since that time. Similarly, the controller requires total replacement. Although Chalmette previously upgraded the personal computer that served as the original controller, the software, which was originally written in 1990, has become antiquated and is no longer supported by the original manufacturer.

Chalmette, together with its engineering consultant, has spent considerable time examining how to best replace these key system components without materially disrupting its commercial operations or jeopardizing the welfare of its employees. Because Chalmette's employees and contractors have also received *years* of weekly safety-of-life training to recognize the meaning of the different tones that the IPS 400/800 Warning System can produce, the need to preserve the same type of system tones has limited and complicated the choices for replacement equipment. Furthermore, the continuous operations at the refinery have made planning difficult, and only recently was Chalmette able to finalize an installation and procurement plan.

Despite these challenges, Chalmette intends to realize a number of benefits by replacing the outmoded wideband components. The upgrade will not only allow Chalmette to comply with the narrowband requirements, but also bring the IPS 400/800 Warning System into compliance with the manufacturer's eligibility requirements for technical maintenance and support. Consequently, Chalmette anticipates that full replacement of the outmoded components will improve its radio communications capabilities in the long term and further promote the safety of its employees and stakeholders.

C. Chalmette's Narrowbanding Efforts Must Account for Its Close Relationship with the St. Bernard Fire Department.

Denial of this waiver request will not only prejudice Chalmette, but also significantly harm the St. Bernard Fire Department, which monitors Chalmette's radio communications on a daily basis and relies upon Chalmette's ability to maintain communications in the event of a fire, natural disaster, or other emergency in or around St. Bernard's Parish, including nearby residential neighborhoods. As noted above, Chalmette owns and operates its own first responder unit, which constitutes an important part of the emergency response community in the St. Bernard Parish area of Louisiana. Chalmette's fire unit and St. Bernard Parish Fire Department have a mutual aid agreement in place under which Chalmette's first-responders furnish fire protection equipment, materials, supplies and services to St. Bernard Parish in the event of a large emergency. Chalmette's safety employees also train with the St. Bernard Fire Department and are prepared to work and communicate with the department to protect personnel and equipment located in the refinery and surrounding community. An inability to operate Chalmette's safety-management system for up to four months until the new narrowband radiofrequency communications equipment is fully installed would pose a threat to the refinery, its workers, local residents and the community at large.

The St. Bernard Parish Fire Department has filed a letter urging the Commission to grant this extension request, noting the extent to which it “depends upon Chalmette Refining to respond quickly in the event of a major fire or other emergency” and describing Chalmette’s radio communications network as serving “a critical public safety purpose.”⁸ The letter also confirms that the St. Bernard Parish Fire Department does not expect Chalmette’s continued operations in wideband mode, “on a limited and episodic basis for up to four months,” to create harmful interference to the Fire Department’s VHF radio system.⁹

D. Chalmette Has Taken Substantial Measures to Minimize the Negative Impact of Extended Wideband Operations on Co-Channel and Adjacent Channel Operations.

Chalmette’s continued wideband operation for an interim period after the narrowband deadline is not likely to cause any harmful interference to co-channel or adjacent channel operations, for several reasons. First, although the IPS 400/800 Warning System is vital to the safe operation of Chalmette’s refinery, it is used relatively infrequently. On average, Chalmette broadcasts on the IPS 400/800 Warning System approximately five times per week, with each use lasting between 30 to 60 seconds. Such episodic transmission is highly unlikely to result in material interference to neighboring licensees. Second, the proposed narrowband request would be for an abbreviated period of four months, which further narrows the window of time during which harmful interference could even occur (and which is far shorter in duration than the extension periods that the Commission has afforded other licensees).¹⁰ Third, many of the

⁸ See Letter from Thomas Stone, Fire Chief, St. Bernard Parish Fire Department, to Marlene Dortch, Secretary, Federal Communications Commission (Dec. 4, 2012), attached as Appendix A.

⁹ *Id.*

¹⁰ See, e.g., New York City Transit Authority, Request for Waiver of Section 90.209(b) of the Commission’s Rules, WT Docket 99-87, *Order*, DA 12-1236 ¶ 1 (rel. Aug. 1, 2012) (granted an extension of 42 months) (“*NYC Transit Order*”); Delta Air Lines, Inc., Request for Waiver of Section 90.209(b) of the Commission’s Rules, WT Docket 99-87, *Order*, DA 12-793 ¶ 6 (rel. May 21, 2012) (12 months) (“*Delta Order*”); Onsolow County Emergency

cabinets are located inside the refinery, which reduces the likelihood that the transmitted signals will propagate to other nearby radio systems. Taking these factors into account, the third-party contractor MS Benbow has explained that, based on its engineering experience, continued operation of KNEJ243 is not likely to cause harmful interference to neighboring licensees.¹¹

Even though the risk of harmful interference from narrowband operations on the IPS 400/800 Warning System is low, Chalmette has nevertheless committed to minimize any negative impact in several ways, some of which the Commission has already recognized as militating in favor of granting a narrowband waiver/extension request:

- Chalmette plans to narrowband its outdoor transmitters first to minimize the potential for harmful interference to other nearby operations.¹²
- Chalmette has already begun to alert wireless licensees within proximity of its operations that it may continue to operate in wideband mode after the narrowband deadline, has provided such licensees with contact information should any interference issues arise, and has explained its willingness to work with each potentially affected licensee to minimize interference.¹³
- In the unlikely event that its wideband transmissions do cause harmful interference to nearby radio operations, Chalmette would take reasonable measures to prevent or correct such interference, and would reasonably cooperate with any licensee that experiences such harmful interference.

III. PROPOSED TIMETABLE FOR COMPLETION OF NARROWBANDING

A. Steps Taken to Effect the Narrowband Migration Prior to January 1, 2013

Communications, Request for Waiver of Section 90.209(b) of the Commission's Rules, WT Docket 99-87, *Order*, DA 12-1864 ¶ 1 (rel. Nov. 19, 2012) (16 months); PacifiCorp, Request for Waiver of Section 90.209(b) of the Commission's Rules, WT Docket 99-87, *Order*, DA 12-1650 (rel. Oct. 16, 2012) (10 months).

¹¹ See Letter from Leo L. Holzenthal, Jr., PE, Project Manager, MS Benbow and Associates, to Federal Communications Commission (Dec. 5, 2012), attached as Appendix B.

¹² See *NYC Transit Order* ¶ 8.

¹³ See, e.g., *Delta Order* ¶ 6.

As described above in Section II.A, Chalmette has taken or will have taken a number of significant steps to achieve the narrowband migration prior to January 1, 2013, including:

- Successfully transitioning six of its seven VHF/UHF licenses to narrowband channels;
- Negotiating and executing a purchase order for the replacement equipment and components to narrowband the IPS 400/800 Warning System associated with the KNEJ243 license;
- Authorizing payment for this equipment;
- Making arrangements to receive the equipment on or about December 31, 2012;
- Negotiating an agreement with MS Benbow for the installation, provisioning, testing, and activation of the narrowbanded IPS 400/800 Warning System; and
- Routinely consulting with MS Benbow regarding the narrowband project.

B. Anticipated Dates for Commencement and Replacement

In addition to procuring the narrowband equipment and components, Chalmette has arranged for MS Benbow to install, provision, test, and activate the equipment in the first quarter of 2013. However, to account for any unanticipated obstacles or difficulties that arise in that period – which are heightened given the need to fully replace the core components of the Warning System and could delay any stage of the deployment plan (*i.e.*, procurement, installation, provisioning, testing, and turn-up) – Chalmette requires a temporary extension of at least four months after the narrowband deadline, until May 1, 2013. The company cannot reasonably commit to fully converting to narrowband until that time without jeopardizing the safety and health of the employees and contractors located in and around the refinery.

IV. CONCLUSION

In view of the foregoing, Chalmette respectfully requests that the Commission grant this request for temporary waiver and extend the narrowband deadline until May 1, 2013.

Respectfully submitted,

/s/ *Trey Hanbury*

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Counsel to Chalmette Refining LLC

Appendix A



St. Bernard Parish Government

8201 West Judge Perez Drive
Phone (504) 278-4200

Chalmette, Louisiana 70043
Fax (504) 278-4330

David E. Peralta
Parish President

December 4, 2012

Via ECFS

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: *WT Docket No. 99-87, Chalmette Refining LLC Request for Limited Waiver and Extension*

Dear Ms. Dortch:

On behalf of the St. Bernard Parish Fire Department ("Department"), I am writing to express the Department's support for Chalmette Refining LLC's ("Chalmette Refining") Request for Limited Waiver and Extension related to its safety-management communications system.

We at the St. Bernard Parish Fire Department work closely with Chalmette Refining and especially with Chalmette Refining's emergency response team. The Department depends upon Chalmette Refining to respond quickly in the event of a major fire or other emergency. Indeed, the Department and Chalmette Refining have a mutual aid agreement in place that allows our two first responder agencies to work together and share equipment and supplies in the event of a large incident or emergency. In addition, safety employees from Chalmette Refining train with our Department to ensure we are both prepared to jointly protect our community.

By providing critical information to the employees and contractors at the refinery, Chalmette Refining's wideband radio communications network serves a critical public safety purpose. The loss of this system for even a brief period of time could impede our Department's ability to protect St. Bernard Parish and our Nation's Industrial infrastructure. Although the St. Bernard Parish Fire Department will commence operations on narrowband frequencies in 2013, we do not anticipate Chalmette Refining's continued wideband operations on a limited and episodic basis for up to four months will create harmful interference to our VHF radio system. In the event harmful interference does occur, however, we remain in close communications with Chalmette Refining, which has assured us that it will remedy any interference by ending transmissions over their system upon our request.

Maintaining continuous operation of Chalmette Refining's safety-management communications system is critical to protecting not only Chalmette Refining, but also the surrounding community. On behalf of the St. Bernard Parish Fire Department, I support Chalmette Refining's request for four months of additional time to implement a narrowband communications system. Kindly contact me with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Stone', with a stylized flourish at the end.

Thomas Stone
Fire Chief
St. Bernard Parish Fire Department
8201 W. Judge Perez Dr.
Chalmette, LA 70043
(504) 278-4275

Appendix B



December 5, 2012

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

LA Engineering Registration # 868
LA Contractor License # 28140
Electrical and Mechanical Work Statewide
Telecommunications (Specialty)
FL Engineering Registration # 28684
MS Engineering Registration # E-1186
OK Engineering Registration # 6016
TX Engineering Registration # 2988

Re: Narrow Banding Extension Request CallSign KNEJ243
MSB&A Project no. 2012-211, Letter no. 120359

Chalmette Refining LLC. (CRLLC) is currently in the process of narrow banding critical infrastructure that operates on 450 MHz frequencies to comply with the FCC mandate. Progress has been made on multiple systems throughout the facility. A critical system with the call sign KNEJ243 that is used for a life safety application, plant wide evacuation alarming, will not be complete by January 1, 2013. Hardware components to complete narrow banding of this system have been ordered, but the manufacturer cannot provide them in adequate time. CRLLC is making every effort to expedite the process and will narrowband this system once all components have arrived.

We do not believe that CRLLC's continued operation of a wideband 450 MHz channel after the deadline expires would cause harm to any licensees in the area. CRLLC is requesting that the FCC grant a 120 day extension to allow completion of narrow banding efforts on callsign KNEJ243.

If you have any questions or need any further information, please let me know.

Sincerely,
M S Benbow and Associates



Leo L. Holzenthal, Jr., P.E.
Project Manager

/svl